

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	CRIMINAL ACTION
v.	)	
	)	NO. 04-10299-PBS
2. DANIEL AGUILAR	)	
a.k.a. "Lik"	)	
3. ROBERTO SOLORIO,	)	
4. RICARDO MANUEL ESTRADA	)	
	)	

**GOVERNMENT'S LIST OF PROPOSED EXHIBITS**

The United States of America, by its attorneys, United States Attorney Michael J. Sullivan, and Assistant U.S. Attorneys Neil J. Gallagher, Jr. and Sandra Bower, submits this List of Proposed Exhibits to assist the Court and jury in the trial of the above-captioned matter. The government reserves the right to supplement or modify this list from time to time, with reasonable notice to counsel.

<u>No.</u>	<u>Description of Exhibit</u>
1.	Ariel Photo of Countryside Motel in Peabody, MA
2.	Rearview Ariel Photo of Countryside Motel in Peabody, MA
3.	Photo of Countryside Motel in Peabody, MA from ground
4.	Second Photo of Countryside Motel in Peabody, MA from ground
5.	Motel registration for Ricardo Estrada for Room #21 on 5/1/04 (DEA N-207)
6.	Motel registration for Daniel Aguilar for Room #14 at 6:56 AM on 5/1/04 (DEA N-207)
7.	Plea Agreement for Maria Escobar
8.	Photo of Andres Martinez wedding (N-188)
9.	Photo of Andres Martinez wedding (with Manolo)(N-188)

10.	Photo of 6 Endicott Street
11.	Photo of front door of 6 Endicott Street
12.	Photo of garage at 6 Endicott Street
13.	Photo of 172 Lake Street
14.	2 <sup>nd</sup> photo of 127 Lake Street
15.	Composite CD for Calls Involving Maria Escobar (Exhibits 15N, 15Q, 15R)(Call Nos. 1802, 34, 1806))
16.	Transcripts for All Calls - (Exhibits 16A to 16S)
17.	2/20/04 Wiretap Order for 603-265-0739
18.	3/18/04 Wiretap Order for 603-265-0739
19.	4/28/04 Wiretap Order for 603-265-0739 and 323-834-8480
20.	Chart of Pen Register Data for TT#19 and TT#21 for Wiretap Calls
21.	Composite CD for all Wiretap Calls (Exhibits 22S - 22S)(see separate list for details)
22.	File Lists for Calls on CD, Exhibit 21
23.	2/10/04 Western Union Wire Transfer: \$200 from Joel Zequeira to Daniel Aguilar Pazol
24.	2/10/04 Western Union Wire Transfer: \$200 from Joel Zequeira to Daniel Aguilar Pazol
25.	American Airlines Flight Records for travel for Daniel Aguilar from Guadalajara, Mexico to Boston, MA on 3/24/04
25A.	Business Record Certification for American Airlines Flight Records for travel for Daniel Aguilar from Guadalajara, Mexico to Boston, MA on 3/24/04
26.	ATA Flight Records for Roberto Solorio for travel from San Francisco, CA to Boston, MA on 3/24/04
26A.	Business Record Certification for ATA Flight Records for Roberto Solorio for travel from San Francisco, CA to Boston, MA on 3/24/04
27.	Photo of 17 Farm
28.	2 clear plastic wrappers (kilogram wrappings) seized from trash outside 17 Farm Avenue on September 17, 2003 (DEA No. 4)

29.	6 U-haul boxes seized from trash outside 17 Farm Avenue on September 17, 2003 (N-17)
30.	Airport luggage receipt, Jesus Salas, flight from Phoenix to Boston seized from the trash outside 17 Farm Avenue on September 17, 2003 (N-20)
31.	Demonstrative Exhibit - Demonstration of 10-Code
32.	T-Mobile Subscriber and Telephone Toll Records for 978-223-0838, Subscribed to Roberto Solorio
32A.	Business Record Certification for T-Mobile Subscriber and Telephone Toll Records for 978-223-0838, Subscribed to Roberto Solorio
33.	Surveillance Video outside 172 Lake Street, Peabody
34.	Demonstrative Exhibit: Map to Show Distance Between 172 Lake Street and Countryside Motel
35.	MA RMV Registration for Gold Cadillac, registered to Joel Zequeira
36.	MA RMV Registration for Blue Land Rover (MA 74CG17), registered to Carlos Arguetta
37.	Selected Excerpt of Surveillance Video outside 6 Endicott Street, Danvers from 5/1/04
38.	Large Black Suitcase Containing Cocaine (N-218)
39.	Smaller Black Suitcase Containing Cocaine (N-218)
40.	Representative Sample from 50.18 kilograms of Cocaine (DEA 8)
41.	Video from 50 kilograms of Cocaine (N-70)
42.	Cell phone found on coffee table at 6 Endicott Street with number 323-834-4640 (N-217)
43.	Cell phone found on Andres Martinez with number 603-265-0739 (N-216)
44.	Identifications and Credit Cards found on Andres Martinez (N-266)
45.	Identifications found on Daniel Aguilar (N-263)
46.	Telephone toll records for T-Mobile number 978-223-0838
46A.	Business Certification for Telephone toll records for T-Mobile number 978-223-0838
47.	Toll records for Nextel cell phone 909-770-4936

47A.	Business Certificate for Toll records for Nextel cell phone 909-770-4936
48.	Records from Dependable Highway Express (DHE) for scheduled deliveries for Ricardo Estrada
48A.	Business Record Certification for Records from Dependable Highway Express (DHE) for scheduled deliveries for Ricardo Estrada
49.	Small blue T-Mobile phone with phone number 978-223-0838 seized from Roberto Solorio (N-215)
50.	Intercepted Call Regarding Seizure of Cellular Phone 323-834-4640 (Call No. 36)
51.	Piece of paper with number 978-223-0838 found in Ricardo Estrada's tractor trailer (N-222)
52.	Identifications seized from Ricardo Estrada (N-265)
53.	DEA 7 Laboratory Report for 50.18 kilograms of Cocaine (DEA 8) from Forensic Chemist Jennifer Chu
54.	Photos of 17 kilograms of Cocaine and Three Firearms Seized on July 24, 2003 in Medford, MA
55.	17 Kilograms of Cocaine Seized on 7/24/03
56.	An Uzi 9mm firearm, bearing serial number SZ28382
57.	Empty Bottles of Boric Acid and Loose Papers Seized from the Trash Outside 6 Endicott Street on 3/30/04 (N-262)
58.	State Police Laboratory Report Regarding 15.41 pounds of cocaine found in blue "Nike" duffle bag on 7/24/03
59.	State Police Laboratory Report Regarding 21.51 pounds of cocaine found in rolling carry-on suitcase on 7/24/03
60.	9mm gun holster, ammunition, laser sight seized from 172 Lake Street, Peabody (N-184)
61.	Bottles of Boric Acid and Packaging Materials Seized from 172 Lake Street, Peabody
62.	Identifications for Daniel Aguilar Seized from 172 Lake Street
63.	Passport for Daniel Aguilar Seized from 172 Lake Street
64.	Copy of AA Airlines Ticket for Daniel Aguilar Seized from 172 Lake Street
65.	Record of ATA Flight 152, Roberto Solorio on 3/24/04 Seized from 172 Lake Street (N-188)

66.	Verizon Bill for Roberto Solorio for 978-536-2792 Seized from 172 Lake Street (N-188)
67.	Plea Agreement for Rogelio Garcia
68.	Registration for 1997 Mercury Mountaineer in name Rogelio Garcia
69.	Videotape of hidden compartment in Mercury Mountaineer

As further described below in Exhibits 15, 16, 21, and 50, the government intends to introduce the following phone calls intercepted pursuant to Title III wiretaps and Spanish/English transcripts of these phone calls:

<u>Exhibit No.</u>	<u>Date</u>	<u>Time</u>	<u>Call #</u>	<u>Target Telephone</u>
20A	02/21/04	19:09	12	603-265-0739 (TT#19)
20B	02/23/04	10:17	57	603-265-0739 (TT#19)
20C	03/01/04	16:97	266	603-265-0739 (TT#19)
20D	03/05/04	11:34	414	603-265-0739 (TT#19)
20E	03/08/04	21:18	488	603-265-0739 (TT#19)
20F	03/18/04	11:03	673	603-265-0739 (TT#19)
20G	03/18/04	21:11	699	603-265-0739 (TT#19)
20H	04/09/04	18:32	1335	603-265-0739 (TT#19)
20I	04/09/04	18:46	1336	603-265-0739 (TT#19)
20J	04/30/04	12:27	25	323-834-4640 (TT#21)
20K	04/30/04	12:44	26	323-834-4640 (TT#21)
20L	04/30/04	16:10	29	323-834-4640 (TT#21)
20M	04/30/04	19:16	1797	603-265-0739 (TT#19)
20N (Chila)	04/30/04	22:25	1802	603-265-0739 (TT#19)
20O	05/01/04	7:08	32	323-834-4640 (TT#21)
20P	05/01/04	7:26	33 (1805)	(323-834-4640) (TT#21); 603-265-0739 (TT#19)
20Q (Chila)	05/01/04	7:27	34	323-834-4640 (TT#21)
20R (Chila)	05/01/04	7:29	1806	603-265-0739 (TT#19)

20S	05/01/04	8:39	35 (1808)	323-834-4640 (TT#21); 603- 265-0739 (TT#19)
50*	05/1/04	9:38	36	323-834-4640 (TT#21) to DEA

\*There is no transcript for Exhibit No. 50, Call No. 36, since the call is in English between TFA Chris Borum and the DEA Wire Room.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Neil J. Gallagher, Jr.

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Date: February 22, 2006

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and mailed to all those not participating in ECF.

/s/ Neil J. Gallagher, Jr.  
Neil J. Gallagher, Jr.